

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

MEMORY CONTROL ENTERPRISE, LLC.,)
Plaintiff,)
v.) Case No. 07 C 4903
MOTOROLA, INC. and UNITED STATES) Honorable Charles R. Norgle
CELLULAR CORPORATION,) Magistrate-Judge Martin C.
Defendants.) Ashman

**MOTION FOR ENTRY OF AGREED ORDER
OF DISMISSAL WITH PREJUDICE**

The plaintiff, Memory Control Enterprise, and defendant, Motorola, Inc. ("Motorola"), have reached an agreement in settlement of all claims and counterclaims asserted between them. Accordingly, these parties respectfully request that each claim of plaintiff against Motorola, and each claim and defense of Motorola against plaintiff, in this action shall be, and hereby are, dismissed with prejudice, plaintiff and Motorola to bear their own costs and attorneys' fees. Attached for the convenience of the Court is a proposed Order of Dismissal With Prejudice and a signed copy of a Stipulation of Dismissal With Prejudice.

This Agreed Order of Dismissal With Prejudice is not intended as a waiver or release of any claims that plaintiff or Motorola has against any other party or non-party.

Respectfully submitted,

/s/ Richard B. Megley, Jr. _____

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CERTIFICATION OF SERVICE

The undersigned hereby certifies that a copy of the foregoing **MOTION FOR ENTRY OF AGREED ORDER OF DISMISSAL WITH PREJUDICE** was electronically filed with the Clerk of Court using CM/ECF system, which will send notification by electronic mail to the following:

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on May 27, 2008.

/s/ Richard B. Megley, Jr.
